

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

KATHERINE BELCASTRO-GONZALEZ,)	CASE NO. 8:19cv572
)	
Plaintiff,)	
)	
v.)	MOTION FOR ENLARGEMENT OF TIME
)	
CITY OF OMAHA, et al.,)	
)	
Defendants.)	

COME NOW the Defendants, City of Omaha and Chief Todd Schmaderer by and through their undersigned counsel of record, moves the Court for additional time in which to submit a MOTION FOR SUMMARY JUDGMENT.

IN SUPPORT OF THIS MOTION, the Defendants state:

1. The current deadline for filing Motions for Summary Judgment is March 31, 2022;
and
2. The parties were vigorously undertaking settlement discussions and are still trying to reach a settlement agreement; and
3. The undersigned has spoken to Plaintiff's counsel and counsel does not object to the extension; and
4. Defendants seek an extension until April 29, 2022.

WHEREFORE, the Defendants pray for an Order granting the Defendants an extension of time until April 29, 2022 in which to file a Motion for Summary Judgment.

Respectfully submitted this 31st day of March, 2022.

CITY OF OMAHA, et al., Defendants.

By: s/ Michelle Peters

MICHELLE PETERS, No. 20021

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Attorney for the Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 31st day of March, 2022, the foregoing **MOTION FOR ENLARGEMENT OF TIME** was served on all parties registered with the CM/ECF system, which will send electronic notice of the foregoing to those registered with the Court, including: Thomas White and Amy Jorgensen, WHITE, JORGENSEN LAW FIRM, 3114 St. Mary's Ave., Omaha, NE 68105.

s/ Michelle Peters

Deputy City Attorney